

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI

In Re: MARCO ANTONIO RAMOS)
 LISA MARIE RAMOS) Case No. 17-40366
) Debtors)

OBJECTION TO CLAIM

COME NOW Debtors, Marco and Lisa Ramos, and hereby object to the Proof of Claim 3-1 filed by United Consumer Financial Services (UCFS Kirby Cleaning System), in the secured amount of \$2,089.13 on March 21, 2017.

PURSUANT TO LOCAL RULE 3007-1 (C), THE CLAIMANT SHALL HAVE 30 DAYS AFTER SERVICE OF THE OBJECTION IN WHICH TO FILE A RESPONSE. THE RESPONSE SHALL BE IN WRITING AND STATE WHY THE CLAIM SHOULD BE ALLOWED AS FILED. IF A RESPONSE IS FILED, THE COURT WILL SCHEDULE A HEARING. IF NO TIMELY RESPONSE IS FILED, THE COURT WILL ENTER AN ORDER SUSTAINING THE OBJECTION TO THE CLAIM. PARTIES NOT REPRESENTED BY AN ATTORNEY SHALL MAIL A RESPONSE TO THE COURT AT THE ADDRESS BELOW. DEBTOR(S) NOT REPRESENTED BY AN ATTORNEY MUST BE SERVED A COPY OF THE RESPONSE BY MAIL.

The basis for the objection is as follows:

- X The claim should instead be allowed as an unsecured claim in the amount of \$2,089.13 because creditor has provided no documentation or evidence indicating the Claim is secured.

Dated: 07/16/2018

Respectfully submitted,
W M Law

/s/ G. Addam Fera
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ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2018, the foregoing was delivered via e-mail to the parties listed below that are registered to receive electronic filings on ECF, and regular first class, postage prepaid to the parties listed below that are not registered to receive electronic filings on ECF.

Court Address: U.S. Bankruptcy Court, 400 E. 9th Street, Rm 1510, Kansas City, MO 64105

United Consumer Financial Services
c/o Bass & Associates, P.C.
3936 E. Ft. Lowell, Suite 200
Tucson, AZ 85712

/s/ G. Addam Fera